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JAN 17 1992

Federal Communications Commission
Office of the Secretary

January 16, 1992

VIA FEDERAL EXPRESS

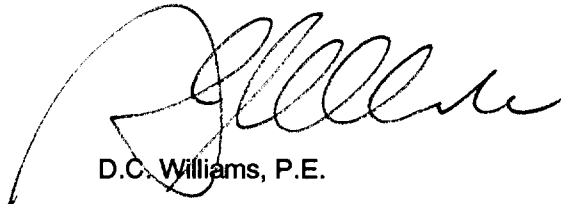
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20036

Dear Madame Secretary:

Enclosed please find an original and four conformed copies of a Petition for Rulemaking to substitute FM Channel 237B1 for 237A at Fort Bragg, California and modify the license of station KOZT (FM) to specify operation on the new channel.

If any questions arise with regard to the processing of this petition, please communicate directly with California Radio Partners, the petitioner, at the address provided in the petition.

Sincerely,



D.C. Williams, P.E.

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List A B C D E

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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Federal Communications Commission
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In the Matter of

Amendment of Section 73.202(b))
of the Commission's Rules and)
Regulations (Table of Allotments),)
Fort Bragg, California)

FCC MAIL BRANCH

To: the Chief, Mass Media Bureau

PETITION FOR RULEMAKING

California Radio Partners ("CRP"), licensee of Station KOZT (FM), Fort Bragg, California, respectfully petitions the Federal Communications Commission to amend §73.202(b) of the Commission's Rules and Regulations to substitute FM Channel 237B1 in lieu of Channel 237A at Fort Bragg, California and modify the license of KOZT (FM) to specify operation on Channel 237B1. California submits that such substitution and modification will serve the public interest, convenience, and necessity.

THE PROPOSED SUBSTITUTION WILL PROVIDE IMPROVED
SERVICE TO THE PUBLIC

Fort Bragg is located on the Pacific Coast in central Mendocino County, California. Since 1970, the population of Mendocino County has increased by more than 55%, principally the result of population migration from the more urbanized areas of Northern California. Annual growth has averaged over 3% per year, and projections allow that this rate of growth will increase in the coming years. The city of Fort Bragg has experienced commensurate growth in the recent past and is the only incorporated city between San Francisco and Eureka with full community attributes and the normal complement of public services. As the city of Fort Bragg completes the annexation of two major subdivisions in the near future, both the area and population of the city will increase dramatically. In addition to the growth of Fort Bragg itself, the general growth of the county and rural areas surrounding Fort Bragg are experiencing unprecedented growth. Numerous small communities now boast populations of several hundred

persons each, resulting in an aggregate population in these rural areas of several thousand. As the largest incorporated city on the Mendocino County coast, Fort Bragg functions as the cultural, economic, and communication center of the region. Fort Bragg is home to the only comprehensive health care facility and Chamber of Commerce in the area as well as the headquarters for law enforcement, major utilities, and major industry.

There is no local daily newspaper anywhere in the area, and KOZT provides the major source of live local news and information for the population in coastal Mendocino County. As the only station in the area with a local newsperson on staff and live aural broadcast service during prime listening periods, service organizations and local officials rely on KOZT to disseminate important emergency and community information. The natural terrain is very irregular with many valleys sheltered by ridges of significant elevation. Owing to these terrain characteristics, less than adequate service is provided to many pockets of significant population with the current Class A facilities. The substitution of Class B1 facilities would allow enhanced service to these areas and the population which resides therein.

THE PROPOSED SUBSTITUTION COMPLIES WITH
APPLICABLE TECHNICAL STANDARDS

As demonstrated in the appended Engineering Exhibit of D.C. Williams, P.E., the proposed substitution of 237B1 for 237A at Fort Bragg, California complies with all applicable mileage separations as specified in the Commission's Rules and Regulations. The reference coordinates specified for Channel 237B1 are those of the existing KOZT site, from which 70 dBu service would be rendered to all of the anticipated (post-annexation) city limits of Fort Bragg. Should the instant petition be granted by the Commission, Class B1 facilities will enable the licensee to fully investigate a number of other potentially available sites from which to serve Fort Bragg and the surrounding population. A number of those sites would not provide the requisite service to the principal city with Class A facilities, but will be expected to do so with the Class B1 facilities requested herein. The licensee will continue to strive to provide maximum possible service to the public.

CRP WILL PROMPTLY MODIFY THE FACILITIES OF KOZT
TO SPECIFY OPERATION ON CHANNEL 237B1

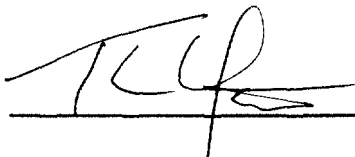
Upon grant of the instant petition, CRP will promptly file a minor change application with the Mass Media Bureau of the Commission specifying operation with Class B1 facilities and, upon grant thereof, will promptly construct and implement the proposed facilities.

Accordingly, for good cause shown herein, it is respectfully requested that the Commission amend the FM Table of Allotments (47 CFR 73.202(b)) as follows:

| | | |
|-------------------------------|-------------------------|--------------------------|
| | <u>EXISTING</u> | <u>PROPOSED</u> |
| Fort Bragg, California | 237A, 244A, 249A | 237B1, 244A, 249A |

In addition, it is respectfully requested that the Commission concurrently modify the license of FM Station KOZT to specify operation on Channel 237B1.

Respectfully submitted,
CALIFORNIA RADIO PARTNERS
by



General Partner
Title

1/15/92
Date

California Radio Partners
Station KOZT (FM)
124 East Laurel
Fort Bragg, CA 95437
(707) 964-7277

EXHIBIT "*ENG*"

ENGINEERING EXHIBITS IN SUPPORT OF PETITION FOR RULEMAKING

Prepared for

California Radio Partners
Station KOZT
Fort Bragg, California

January, 1992

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ENGINEERING STATEMENT OF D.C. WILLIAMS, P.E., CONSULTING ENGINEER

This Engineering Statement is prepared on behalf of California Radio Partners, licensee of KOZT (FM), Fort Bragg, California in support of the instant Petition for Rulemaking seeking substitution of FM Channel 237B1 in lieu of Channel 237A at Fort Bragg, California and modification of the KOZT license to specify operation with B1 facilities on the new channel.

As demonstrated in the appended allocation study, the substitution B1 facilities of Channel 237A may be accomplished from the presently licensed KOZT site in full compliance with all applicable mileage separation requirements. The presently licensed Class A facilities are not shortspaced to any other allotment, and the proposed Class B1 facilities will not create any new shortspacings. The licensed KOZT site coordinates, utilized herein as the proposed Class B1 reference coordinates, are

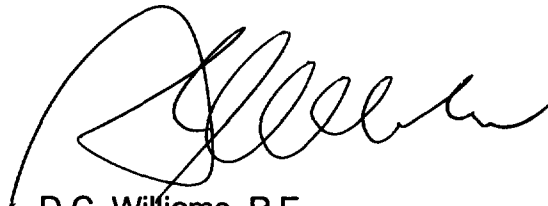
NL 39° 24' 24"

WL 123° 44' 04"

Use of this site with Class B1 facilities will ensure 70 dBu service to the entire principal community with no loss of service area.

In summary, the proposed substitution comports with all applicable engineering standards of the Commission, and it is respectfully requested that the accompanying petition be granted.

Respectfully submitted,



D.C. Williams, P.E.
Consulting Engineer

January 11, 1992

CERTIFICATION OF ENGINEER

I HEREBY CERTIFY:

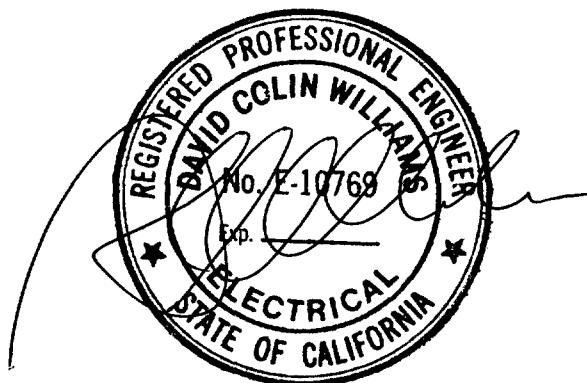
that I am a Registered Professional Engineer, a member of the Association of Federal Communications Consulting Engineers, and an experienced Consulting Engineer whose qualifications and previous works are a matter of record with the Federal Communications Commission in Washington, D.C.;

that I have been retained by California Radio Partners to prepare the instant engineering exhibits;

that same has been prepared by me or under my immediate supervision;

and that, under penalty of perjury, all representations contained herein are true and correct to the best of my knowledge and belief.

EXECUTED ON THIS 11th DAY OF JANUARY, 1992



D.C. Williams, P.E.
Consulting Engineer



CHANNEL 237B1 ALLOCATION STUDY

***** FM CHANNEL SPACING STUDY *****

Proposed KOZT, Fort Bragg, CA
Channel: 237B1

Latitude: 39 24 24
Longitude: 123 44 4

| CH | Call | Record | City | ST | Status | Bear. | Dist. | Reqd. Dist. | Result |
|-------|--------|--------|------------|----|--------|-------|-------|----------------|--------|
| 237B1 | | 22404 | Vacaville | CA | VACANT | 124.1 | 185.5 | 175.0 | 10.5 |
| 237A | KUIC | 22408 | Vacaville | CA | CP | 128.8 | 194.5 | 143.0 | |
| 236B | KPAYFM | 22483 | Chico | CA | LIC | 70.2 | 182.8 | 145.0 | 37.8 |
| 240A | NEW | 22763 | Healdsburg | CA | APP | 141.7 | 109.7 | 48.0 | |
| 240A | | 22767 | Healdsburg | CA | VACANT | 141.1 | 110.6 | 48.0 | |
| 238A | | 22769 | Middletown | CA | ADD | 126.6 | 121.0 | 96.0 | 25.0 |
| 237B1 | KUIC | 22777 | Vacaville | CA | APP | 128.0 | 180.7 | 175.0 | 5.7 |
| 240A | NEW | 22778 | Healdsburg | CA | APP | 140.4 | 104.3 | 48.0 | |
| 240A | NEW | 22781 | Healdsburg | CA | APP | 141.2 | 108.7 | 48.0 | |
| 237A | KUIC | 22782 | Vacaville | CA | LIC | 127.9 | 191.6 | 143.0 | 48.6 |
| 240A | NEW | 22785 | Healdsburg | CA | APP | 140.5 | 104.0 | 48.0 | |
| 240A | NEW | 22792 | Healdsburg | CA | APP | 143.1 | 109.2 | 48.0 | |
| 240A | NEW | 22808 | Healdsburg | CA | APP | 140.5 | 104.2 | 48.0 | |
| 240A | NEW | 22810 | Healdsburg | CA | APP | 145.0 | 117.3 | 48.0 | |
| 239B | KALF | 22830 | Red Bluff | CA | LIC | 57.7 | 107.5 | 71.0 | 36.5 |
| 237A | KOZT | 23144 | Fort Bragg | CA | LIC | .0 | .0 | 143.0 | -143.0 |
| 290B | KMRJ | 23170 | Ukiah | CA | LIC | 118.2 | 64.6 | 17.0 | 47.6 |

***** End of channel 237 study *****